

Eaton considerations on MD/HD GHG Phase 3

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Traditional Vehicle Group Product Portfolio

Serving multiple customers & markets globally

Light Duty Technologies



Valves



Variable Valve Actuation (VVL/CDA)



eVaptive



TVS Supercharger



Fuel Emission Controls



Gears & shafts



Light Duty Transmissions



Differentials

Commercial Vehicle Technologies



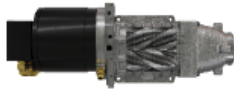
Engine Valves



Engine Brake



Cylinder Deactivation (CDA)



TVS Fuel Cell



Clutches



Aftermarket



Automated Transmissions



Gearing Systems



Powering Business Worldwide



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eMobility



- Power Electronics
- Distribution, safety
- Charging, Hydrogen



HV power electronics



On-board charging



Power distribution and protection



Connectors and busbars



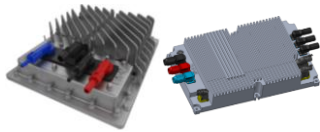
Fuel Cell systems

Eaton solutions to address emerging needs

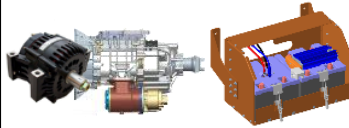
Focus on new technologies around low emissions and powertrain/ vehicle efficiency

48V Adoption

- Power creation
- 48V accessories
- System integration



Power electronics



*48V architecture /
power management*



Engine de- accessorizing

Engine Optimization

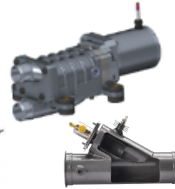
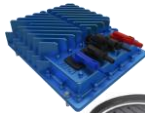
- Efficiency, low CO₂
- Low NO_x
- Natural Gas



*Advanced
valvetrain /
Cylinder
Deactivation*



EGR control



*Exhaust thermal
management*

Drivetrain Efficiency

- Efficiency
- Performance
- Hybridization



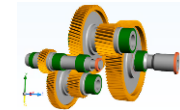
*Endurant
(HD/XD)*



*Advanced
clutch – down-
speeding*



*MD & HD EV
transmissions*



*EV high speed
gear reduction*

Key ideas

- Eaton **supports the EPA upcoming rule**
 - Clear targets to industry
 - Builds on the track record of Phase I and II
 - Creates certainty in technology investments that ultimately leads to US technology leadership and jobs opportunities.
- The segments with **high VMT/ CO2 emissions are hardest to de-carbonize:**
 - High number of HD ICE during Phase III, and CO2 emissions accumulating through 2040-2050
- Phase III should both
 - **Drive ZEV adoption** wherever possible
 - Incentivizes **the lowest possible emissions of remaining ICE-based vehicles**, paired with low NOx emissions a recent EPA rule

2027 NOx technologies: reductions in CO2 for ICE-based vehicles, starting in 2027, within the Phase I and II framework and methodology.

- Diesel engine CO2 set 3% lower than the corresponding Phase II 2027 limits
- Mild hybrid tractors: an additional 2-5% CO2 reduction at the vehicle level
- Strong Hybrids improve CO2 emissions by 15-25% in vocational cycles while improving vehicle performance and productivity.

Phase III fleet-average standards, beyond accounting for ZEV, could:

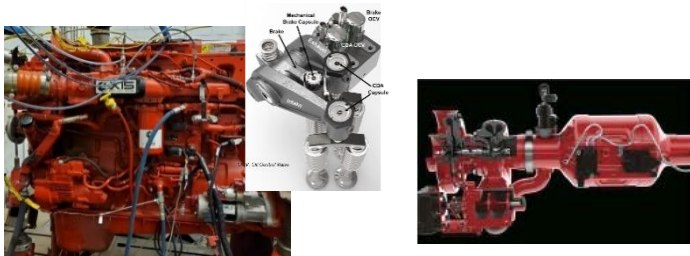
- Revisit engine standards in 2027, beyond Phase II 2027
- Vehicle CO2 reductions for the balance of the fleet, beyond Phase II 2027.

ZEV trucks and buses are wasting ~25% of their grid charge but all ZEV trucks are the same, regardless of efficiency

- Inefficiency: barrier to deployment, but cheap energy means weak market forces
- ZEV powertrain losses can be quantified in GEM (done in Europe)
- SmartWay-like program using GEM-based efficiency could drive efficiency without explicitly addressing upstream emissions and infrastructure costs

2027 NOx engine packages also lower CO2

Low NOx packages achieve 1.5% CO2 reduction beyond Phase II



2018 engine + Cylinder Deactivation + Light-Off Catalyst

NOx Technology				Engine & Aftertreatment	NOx for 2027 0.035 g/hp-hr	CO ₂ Base: 513 g/hp-hr	
CDA	LO-SCR	eHeater	Burner				
X					0.056	495 (-3.6%)	
	X				0.040 to 0.060	512 (neutral)	
		X 10 kW			0.023	526 (+2.4%)	
			X 50 kW		0.023	510 (-0.7%)	
	X	X 7 kW			0.018	521 to 524 (+1.4 to 2.1%)	
X			X 50/20 kW		0.020	521 (+1.5%)	
X	X				0.018	506 (-1.5%)	
X	X	X 2.4 kW			0.012	505 (-1.5%)	
X	X		X 50/20 kW		0.012	518 (+0.9%)	

Aftertreatment Aged to 430k+ miles

0.050 0.035 0.020 0.005

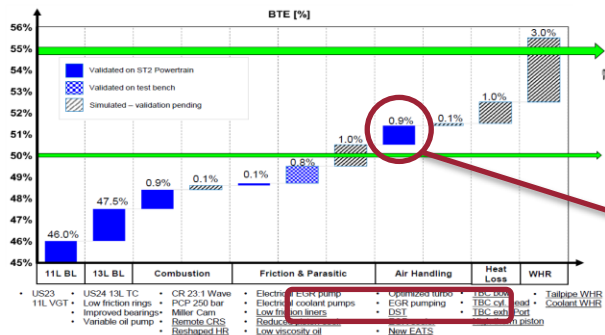
3% Cost Neutral

- Low NOx packages show lower CO2 by 1.5% (not in Phase II)
- Multiple pathways based on mature, cost-effective components that were not included in the Phase II assessments
- CO2 backstop needed: some NOx technologies do increase CO2

Engine focus on additional CO2 reductions

1. Engine

Diesel can achieve 3% CO2 reduction beyond Phase II assessment

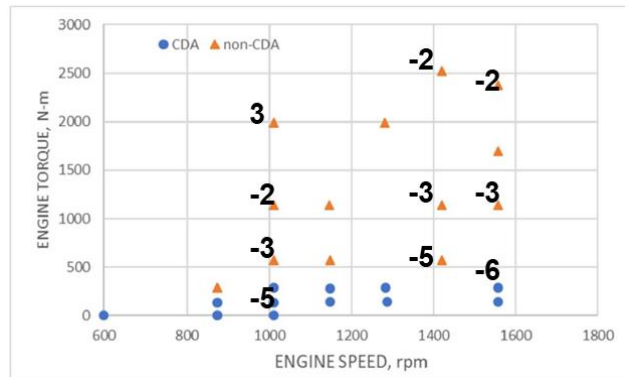


Volvo SuperTruck: EGR pump; re-optimized High Efficiency Turbo; Pumping work; better A/F ratio control

~3% lower CO2

Ref: Volvo 2022 VTO AMR report

>3% CO2 reduction by EGR pumping demonstrated on multiple engine platforms without impact on NOx

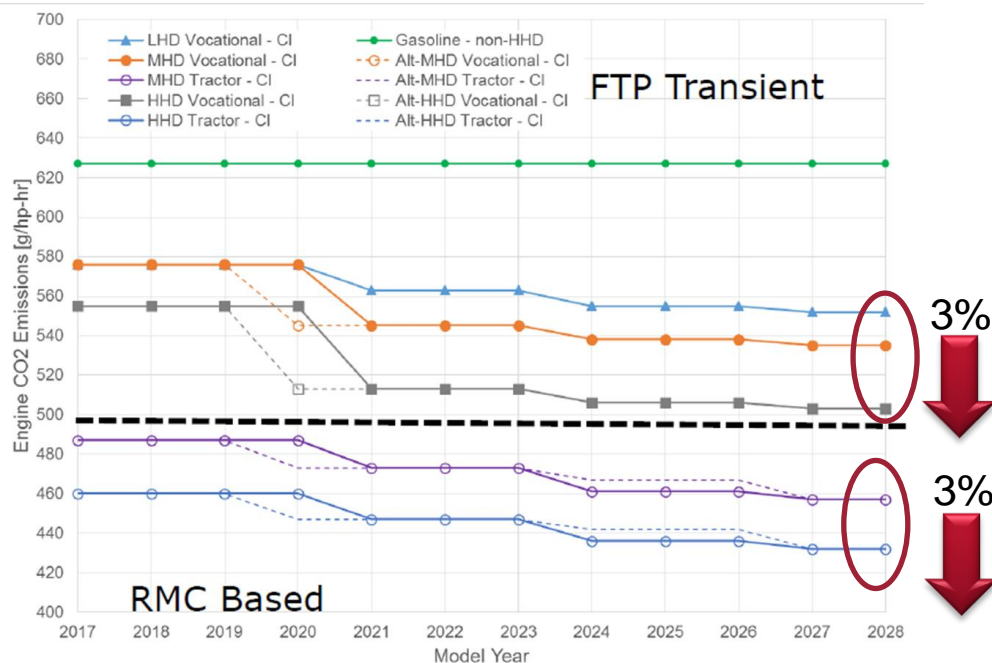


Cummins X15 2018 engine at SwRI shows **>3% lower CO2**

Ref: SAE 2021-01-1154

1. Additional CO2 reductions for engines

Diesel Powertrains can achieve 4.5% CO2 reduction today



- Engine CO2 engine emissions improve by up to 3% vs Phase II GHG 2027 limits
- **Achievable with technologies...**
 - ...anyhow needed for 2027 NOx final standard
 - ...not accounted for in the Phase II rule, but developed since 2017
 - ...cost-effective* at \$200 - \$700, generating economic value
 - ... with 50% compliance margin (technology entitlement is 4.5%)

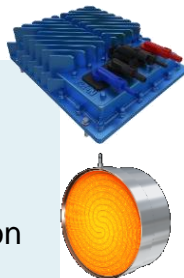
*vs 2027 NOx compliance costs

ICE vehicles – beyond Phase II packages

5% less CO₂ from 48V mild hybrids: an extensions of e-heater NO_x

Active Heating for NO_x

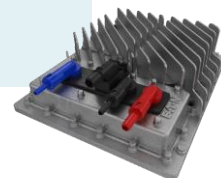
- All on-road OEMs are implementing minimal architectures
- Can deliver up to 1.5% CO₂ reduction
- Cost: \$800 - \$2,000



Increment

48V mild hybrids

- Development since 2017: mild-hybrid HD trucks
- Functions: heater power, electrical accessories, electrical air conditioning, power steering
- Cost increment: \$1,700 to \$4,000
- CO₂ reduction: 2% – 6% (incremental)



48V mild hybrid technology can realize 5% CO₂ reduction with 2-year payback based on saved fuel in the largest GHG emissions segment, incremental to low NO_x technology

ICE vehicles – beyond Phase II packages

HD Hybrids reuse investments in MD BEV for 16% CO2 reduction

HD Hybrid = [Downsized] powertrain + MD BEV e-drive + [smaller] MD BEV battery



Modified Endurant: market-leading efficiency long haul freight transmission



Medium duty motor, inverter, battery (BorgWarner, On-highway HD hybrid, up to 50 mile EV range, ultra-low NOx)



High performance vocational / off-road capable trucks

	2021 X15-based powertrain			Improvement in GHG value		
	P2/P3	AT	Endurant HD	AMT vs TCA	P2/P3 vs AMT	P2/P3 vs TCA
HHD - Regional	226.0	259.7	248.2	4.4%	8.9%	13.0%
HHD-MM	255.0	303.3	285.8	5.8%	10.8%	15.9%
HHD-Urban	289.0	356.5	332.4	6.7%	13.1%	18.9%
Sleeper Cab Linehaul	85.8	97.0	93.5	3.6%	8.2%	11.5%
Day Cab Linehaul	89.6	102.9	98.5	4.3%	9.0%	12.9%

13-19% CO2 reduction in vocational trucks, 8-9% in tractors

Transmission	Time* to Reach [Sec.]			
	10 mph	30 mph	45 mph	65 mph
Target speed				
P2/P3	13.0	15.7	29.6	60.3
Allison 4000	12.0	15.1	36.7	84.9
Endurant AMT	15.5	22.6	46.5	98.9

Vocational space value proposition: both fuel reduction and increased productivity

Hybrid technology re-applies MD BEV investments to realize 8% CO2 reduction in regional and 16% in vocational while increasing truck capability and further reducing NOx

2. Additional CO2 reductions for ICE vehicles

Diesel trucks set to achieve 5 - 18% CO2 reduction beyond Phase II

Hypothetical category: Phase II HHD mixed

- Diesel only standard = **230 g/ton-mile**
- 3-year roll-out (similar to Phase III)
- Non-Bev technologies:
 - 100% ICE with 48V in 2027
 - Increased deployment HD hybrid 2027 through 2033

	Phase II baseline	BEV penetration	CO2 BEV correction	ICE increment	ICE tech penetration	CO2 ICE correction	Phase III limits
2027	230	10%	207	18%	33%	216.3	194.7
2030	230	20%	184	18%	67%	202.3	161.8
2033	230	30%	161	18%	100%	188.6	132.0



Eaton assumption on NPRM:
Adjust Phase II by BEV penetration



ICE-based vehicle adjustment
for new CO2 technology

- Vehicle emissions improve by 5% - 18% additional CO2 reductions vs Phase II GHG final limits for non-BEV trucks
- **Achievable with technologies...**
 - ...that improve engine emissions by 3% (applicable across non-ZEV vehicles)
 - ...not accounted for in the Phase II rule, but developed since 2017
 - Increase penetration from 2027 through life of Phase III rule, achieving 100% in final year

3. HD EV efficiency needs incentives

BEV technology can reduce grid load by 24%, but needs regulatory pull

	Charger	Battery	Inverter	Motor	Gearbo x	Wheel	Overall
Low Tech	95%	96%	94%	93%	98%	78.1%	90.5%
						12.3%*	
High Tech.	98%	98%	99%	98%	98%	90.4%	119.2%
						28.9%*	

	Energy at wheels [year]	Effective plug-to-wheels eff.	Load on grid	Wasted energy	Cost of technology	Saved energy cost
Low Tech	24 MWh**	90.5%	26.5MWh			
Hi Tech	24 MWh**	119.2%	20.1Mwh	-24.1%	+ \$5,000	-\$640/yr

Electrical bill savings does not justify efficiency...

- 6.4 MWh / year = \$640 cost of electricity
- Hi-Tech package ~ \$4,000 - \$6,000

... but 24% reduction in load is critical for at-scale deployment

- A program like SmartWay can incentivize lower electrical energy usage and inform end-customers to enable choice
- **ZEV efficiency can be quantified precisely**
 - GEM framework allows the quantification of efficiency, and Europe is already doing this in VECTO
 - SmartWay and/or Energy Efficiency labels are proven EPA methods to guide end-customers

*35% of wheel energy is regenerated; 50% limited by motor in single speed powertrains, 5% limit with multi-speed gearbox

** 1.2 kW/mile x 80 miles /day x 250 miles /year = 24 MWh / year at wheels



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